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Testimony on:

Notice of Public Hearing to Provide a Status Report to the Air Resources Board on the Advanced Clean Cars Program

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Good morning. I'm Mike Hartrick, Senior Planning Engineer at Chrysler Group LLC. I'd like to briefly comment on the elements of the mid-term review under discussion today. The Advanced Clean Cars regulations are by far the most comprehensive and challenging set of environmental regulations to be levied on the automobile industry at one time. In the spirit of cooperation, Chrysler worked with ARB staff on the LEV III criteria emission regulation, endorsed the One National Program to reduce greenhouse gases, and supported the development of the 2018 and later model year ZEV regulation. The collective Advanced Clean Cars regulations add clarity and certainty for manufacturers, with necessary lead time and flexibility provisions.

The LEV III program will bring the tailpipe emissions from all new passenger cars, light-duty trucks and medium duty vehicles to near-zero levels, significantly reducing the light-duty transportation sector's contribution to air pollution. The emission levels set in the LEV III regulation are challenging, especially for larger vehicles, but the standards provide the necessary certainty as we consider new and emerging technologies to meet the greenhouse gas requirements. We urge staff to conduct the essential research, provide sufficient lead time, and to carefully consider manufacturers' investments and the emission trade-offs in new and emerging GHG technologies before proposing to change the particulate matter standards adopted in the LEV III rule.

Chrysler supports the One National Program to reduce greenhouse gases with the understanding that a midterm review will measure performance to assumptions made by the Agencies in setting the standards. All parties understand the enormity of the task and that ultimate success will hinge on technologies achieving desired results, the cost of those technologies, and customer willingness to purchase them. We look forward to working with the Agencies to conduct a thorough, objective, and transparent evaluation to inform the 2022-2025MY standards.

In addition, Chrysler maintains that reducing emissions from vehicles is not enough to realize the 2050 greenhouse gas reduction goal. Reducing the carbon content of transportation fuels is absolutely necessary to achieve our common goal. The transportation fuels industry has a significant role to support the vehicle and fuel system needed for success.

Finally, we support the Board's consideration of a ZEV review as described by the Alliance of Automobile Manufacturers. The ZEV mandate is a significant resource challenge on top of the One National Program, and we need to collectively continue developing the best path forward to ensure customer support to achieve its stated goals.

Thank you and I'd be happy to answer any questions.